

February 15, 2005

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Notice of ex parte presentations: CC Docket No. 96-45*

Dear Ms. Dortch:

This is to advise you that, on Sunday, February 13, and Monday, February 14, Thomas Coates, Vice President, Corporate Development, Dobson Communications Corporation (“Dobson”), Lawrence J. Movshin of this firm and the undersigned, on behalf of Dobson, met in separate meetings with the following State members of the Federal-State Joint Board on Universal Service and their staffs: Hon. Thomas J. Dunleavy of New York (State Chair) and Carl Johnson of New York; Hon. Robert B. Nelson of Michigan; Hon. Elliott G. Smith of Iowa and Peter Bluhm of Vermont; Mr. Billy Jack Gregg of the West Virginia Consumer Advocate’s office and Philip McClelland of the Pennsylvania Office of the Consumer Advocate.

In the meetings, Dobson described the history of the company, the rural character of its licensed area and its commitment to providing urban-quality wireless service to its customers. The attached Fact Sheet regarding Dobson was discussed in the meetings. The attached maps showing signal quality in the Texas 10 RSA were used to illustrate the challenges facing Dobson in serving rural areas as the industry standard for wireless handset power has decreased. Wireless handset power decreases have resulted in a reduction of the area in which high quality signal is available to consumers in the most remote sections of Dobson’s licensed area. The maps also are illustrative of Dobson’s efforts over the last several years to expand coverage in its licensed areas. The economics of rural wireless deployment were discussed, including the difficulty of cost-justifying additional cell sites in areas where the volume of traffic is insufficient to generate the revenue to support the expenditure. As a result, Dobson views universal service support as a crucial part of the effort to continue the expansion of service into ever less dense portions of its licensed areas.

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Dobson also discussed the need to control the growth of the fund size, and urged the Joint Board, in the pending Rural High-Cost Proceeding, and NARUC, in its consideration of intercarrier compensation issues, to take steps to control the size of the universal service fund. Dobson reiterated points made in its comments in the Rural High-Cost Proceeding about resisting calls to move additional ILEC access revenue into the USF, and urged the Joint Board to recommend that all carriers' universal service support be based on forward-looking costs. Dobson reiterated its suggestion from its comments that both rural wireline and rural wireless cost models should be developed, and that each type of ETC could receive support based on its respective model during an interim period. In the long run, however, Dobson recommends that all ETCs receive support based on the least-cost technology.

Pursuant to the Commission's ex parte rules, this notice is being filed electronically in the above-referenced docket. Please direct any questions regarding this filing to the undersigned.

Sincerely,

WILKINSON BARKER KNAUER, LLP

By: /s/
L. Charles Keller

Enclosures

cc (email): Hon. Thomas J. Dunleavy
Hon. Robert B. Nelson
Hon. Elliott G. Smith
Billy Jack Gregg
Carl Johnson
Peter Bluhm
Philip McClelland